

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

ORIGINAL

CHRISTINA H. BURROW

DIRECT DIAL 202-776-2687
cburrow@dlalaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

April 15, 2002

DOCKET FILE COPY ORIGINAL

RECEIVED

APR 15 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton
Acting Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: 2002-First Quarter Status Report - E911 TTY Implementation,
Triton PCS, Inc. and Triton PCS License Company, L.L.C.,
CC Docket No. 94-102

Dear Mr. Caton:

Pursuant to the Federal Communications Commission's Fourth Report and Order in CC Docket 94-102 ("Fourth R&O"), this letter provides a status report on the efforts by Triton PCS, Inc. and its licensee subsidiary Triton PCS License Company, L.L.C. (collectively "Triton") to implement E911 text telephone ("TTY") compatibility on Triton's commercial wireless services networks. In the Fourth R&O, the Commission requested that carriers provide reports by the fifteenth of the month following the end of each calendar quarter detailing certain development, testing, and deployment activities. This letter is Triton's fifth E911 TTY report and it covers activity during the first quarter of 2002.

Triton holds PCS licenses for markets in portions of North Carolina, South Carolina, Virginia, Kentucky, West Virginia, Georgia, and Tennessee. Across all these markets, Triton's network utilizes LM Ericsson Telephone Co. ("Ericsson") TDMA infrastructure equipment. As a result, Triton is entirely dependent on Ericsson's development of TTY solutions that can be integrated into Triton's existing network.

During the previous quarter, Triton had completed its necessary upgrade to Generic Version 7 for all of its existing Ericsson TDMA switches. This generic upgrade will support Ericsson's TTY feature when it becomes generally available. The next phase in Triton's TTY solution implementation involves the installation of the actual Ericsson TTY feature when it becomes generally available.

Ericsson provided Triton with updated information regarding the status of its TTY/TDMA product development. Ericsson is anticipating its TTY feature to be Generally Available (GA) sometime during the month of April, 2002. As previously

0+1

No. of Copies rec'd
List ABCDE

reported there were two outstanding action items involving issues with mobile-to-live PSAP testing and interoperability with a single mobile phone vendor. Ericsson has indicated that it has remedied one of these issues, the interoperability with the single mobile phone vendor. The second action item involving mobile-to-live PSAP testing is still an issue at this time. Ericsson has indicated that there may be character error rates above acceptable levels when a TTY call is terminated at certain PSAPs with certain PSAP vendor equipment. Ericsson has directed Triton to review the findings of the Alliance for Telecommunications Industry Solutions' (ATIS) sponsored TTY Technical Standards Implementation (TTSI) Incubator.¹

As a result of Triton's direct dependence upon Ericsson as its infrastructure vendor, and despite Ericsson's efforts to offer a timely TTY solution, Triton was unable to implement all of the necessary software upgrades and equipment necessary to its switching platform to meet the December 31, 2001 deadline. Pursuant to the Fourth R&O, however, carriers are allowed an additional six-month period (until June 30, 2002) to integrate, test and deploy their TTY technology.²

With respect to TTY handset availability, Triton does not manufacture handsets, and accordingly, must rely upon the efforts of the various handset manufacturers that develop and sell TTY compatible TDMA handsets. Nonetheless, as detailed below, Triton has obtained a TTY compatible handset model from one of its vendors. Until such time as Ericsson's TTY feature is available and can be installed in Triton's network, however, Triton cannot test any manufacturer's handsets to evaluate their compatibility with TTY software and network operations.

In establishing its quarterly reporting requirement, the Commission requested that reporting carriers provide specific information on the following "milestones" and issues:

¹ ATIS informed the Commission that the character error rate is greater than one percent when a TTY call is terminated at certain PSAPs. See Letter to Thomas J. Sugrue, Bureau Chief, Wireless Telecommunications Bureau, Federal Communications Commission, from Megan L. Campbell, General Counsel, ATIS, February 4, 2002. ATIS noted that it had taken steps to address this issue, but that the impact of this problem on the June 30, 2002 compliance deadline remained unclear. In a subsequent meeting with Commission representatives on March 12, 2002, representatives of the TTSI Incubator Program explained that part of the problem is due to the different configurations of PSAP equipment and the different software used at various PSAPs. See Letter to William F. Caton, Acting Secretary, Federal Communications Commission, from Megan L. Campbell, General Counsel, ATIS, March 20, 2002. The representatives informed the Commission staff that the development of a standard test process to resolve this problem is currently underway.

² See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, 15 FCC Rcd 25216, ¶ 8 (2000).

Development Activities

1. **Network Infrastructure Software Development.** As outlined above, Ericsson is Triton's infrastructure vendor across Triton's entire network and Triton remains in constant contact with Ericsson on TTY development issues. Ericsson has reported to Triton the following:

- First Order Application (FOA) testing of Ericsson TTY infrastructure software with a major TDMA carrier was completed in November 2001. Additional FOA testing with the same TDMA carrier was completed in March 2002 with one of two action items cleared.
- At this time, the timing of General Availability of software from Ericsson is slated for sometime in April, 2002.

2. **Handset Development and Testing Plans.** Handset development and testing is the responsibility of Triton's handset vendors/manufacturers. As indicated above, Triton does not manufacture any handsets itself and must rely on the handset vendor's TTY development efforts. At this time, Triton has available to it one TTY compatible handset model from one of its three main handset vendors. The handset is a model manufactured by Panasonic which Triton plans to stock in all of its retail locations. When Ericsson resolves its outstanding issues with its TTY feature, as outlined above, and TTY software can be installed on Triton's network, Triton will begin testing the one TTY compatible handset model available to it. Triton's other vendors still are developing their TTY complaint models for release, and Triton currently does not have any "test" models for these other vendors at this time.

3. **Beta Testing and Lab Testing.** This testing will be completed by the handset vendors rather than carriers such as Triton. As detailed above, Ericsson has completed preliminary lab testing for its TTY software.

4. **Release and General Availability to Carriers of Network Infrastructure Software.** Triton will make use of Ericsson's TTY feature network infrastructure software as soon as it is available commercially.

5. **Availability to Carriers of Full Acceptance Test Units.** Triton currently has available to it one TTY compatible handset model from Panasonic, one of its three main handset vendors. Triton's other vendors still are developing their TTY compatible models for release, and Triton does not have any "test" models for these vendors at this time. Testing will commence after Ericsson's TTY feature is available commercially.

6. **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY Devices.** These efforts are directly dependent on the efforts of Triton's infrastructure vendor, Ericsson, and upon Triton's handset vendors. After the

necessary Ericsson TTY feature is installed, Triton will take all steps within its control to comply with utilization of enhanced TTY devices that are compatible with the Ericsson TDMA platform that makes up its current network.

Testing and Deployment Activities

7. Carrier coordination of testing with PSAP. Triton intends to utilize its existing relationships with PSAPs to facilitate testing of TTY compatibility with E911 communications after the necessary Ericsson TTY feature is available.

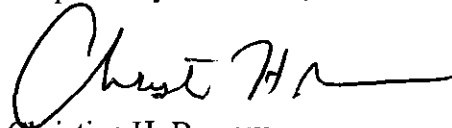
8. Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, And Other Necessary Tests. Until such a time as the necessary TTY feature becomes available, Triton can only develop a thorough test plan to ensure full compliance with TTY compatibility requirements. Once the necessary software has been installed, Triton will conduct tests to ensure achievement of TTY compatibility requirements.

9. Retail Availability Of Necessary Consumer Equipment. When TTY compatible consumer equipment becomes available, and after Triton thoroughly tests the consumer equipment, Triton will utilize its established chain of retail outlets, its Internet website and all other marketing sources to make TTY compatible equipment available to interested subscribers.

10. Geographic Scope Of Network Infrastructure Deployment. Triton intends to deploy TTY support capability and compatibility in its entire network once the necessary TTY feature switch software is available from Ericsson, and adequate testing has taken place to ensure that the requirements of TTY compatibility are met. Triton cannot provide a date certain on which each of these implementation milestones will be achieved, however, it will continue to monitor the events that must occur prior to Triton's ability to test TTY performance on its network and will continue to report progress as required by the Commission.

Should any questions arise or if there is need for further information concerning this Triton status report or Triton's TTY implementation, please contact the undersigned at (202)-776-2687.

Respectfully submitted,



Christina H. Burrow
Counsel for Triton PCS, Inc. and Triton PCS
License Company, L.L.C.

cc: Glen Robinson – Senior Vice President, Engineering and IT
Patrick Forster, Wireless Telecommunications Bureau
Mindy Littell, Wireless Telecommunications Bureau